

SUSMAN GODFREY L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP  
32ND FLOOR  
1301 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10019-6023  
(212) 336-8330  
FAX (212) 336-8340  
[WWW.SUSMANGODFREY.COM](http://WWW.SUSMANGODFREY.COM)

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SUITE 5100  
1000 LOUISIANA STREET  
HOUSTON, TEXAS 77002-5096  
(713) 651-9366

SUITE 1400  
1900 AVENUE OF THE STARS  
LOS ANGELES, CALIFORNIA 90067-6029  
(310) 789-3100

SUITE 3000  
401 UNION STREET  
SEATTLE, WASHINGTON 98101-2683  
(206) 516-3880

SHAWN J. RABIN  
DIRECT DIAL (212) 471-8347

E-MAIL [SRABIN@SUSMANGODFREY.COM](mailto:SRABIN@SUSMANGODFREY.COM)

February 21, 2024

VIA ECF

Hon. John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Eduardo Cohen Watkins v. Rothberg et al*, Case no.: 1:24-mc-00022-JGK

Dear Judge Koeltl:

Pursuant to the Court's February 5, 2024, Orders, Dkts. 9, 10, Petitioner has served a copy of his applications for discovery pursuant to 28 U.S.C. § 1782 upon Ellesse LLC, Mr. Lamb, Mr. Stephen Gardner, and Mr. Richard Rothberg. Proofs of service for each Respondent are attached to this letter as Exhibits A–D, respectively. Mr. Stephen Lamb's counsel, who also represents Ellesse LLC in connection with these applications, also consented to service on behalf of Mr. Lamb, which is reflected in a stipulation filed herewith.

Petitioner, Mr. Lamb, and Ellesse LLC jointly request that all deadlines, including the response and reply deadlines set out in the Court's February 5, 2024, Orders, be held in abeyance for 30 days. Petitioner notified Mr. Rothberg and Mr. Gardner of his intent to ask the Court to hold the applications in abeyance on February 12, 2024. Mr. Rothberg indicated he is agreeable, while Mr. Gardner has not responded. Holding the applications in abeyance would facilitate ongoing negotiations among the parties to the Swiss Actions and would not prejudice any party here.

Mr. Lamb and Ellesse LLC further request, with Petitioner's consent, that they be given 30 days to respond to the application once the abeyance is lifted

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instead of 14 days. Petitioner does not oppose this requested extension, which is also reflected in the stipulation filed herewith.

Respectfully submitted,

*/s/ Shawn J. Rabin*

Shawn J. Rabin